

## **Supplemental Civil Cover Sheet for Cases Removed From State Court**

**This form must be attached to the Civil Cover Sheet at the time the case is filed in the U.S.  
District Clerk's Office. Additional sheets may be used as necessary.**

**1. State Court Information:**

Please identify the court from which the case is being removed and specify the number assigned to the case in that court.

<b>Court</b>	<b>Case Number</b>
334 <sup>th</sup> District Court, Harris County, Texas	No. 2021-48592

**2. Style of the Case:**

Please include all Plaintiff(s), Defendant(s), Intervenor(s), Counterclaimant(s), Crossclaimant(s) and Third Party Claimant(s) still remaining in the case and indicate their party type. Also, please list the attorney(s) of record for each party named and include their bar number, firm name, correct mailing address, and phone number (including area code).

***Plaintiff:***

CLINGMAN & HANGER MANAGEMENT ASSOCIATES, LLC, AS TRUSTEE OF THE FURIE  
LITIGATION TRUST

***Plaintiff's attorneys of record:***

Robert M. Corn  
State Bar No. 04828600  
3131 Eastside St., Suite 440  
Houston, Texas 77098  
Telephone: (713) 229-0055

Bijan Amini (No Texas Bar Number)  
Avery Samet (No Texas Bar Number)  
Amini LLC  
131 West 35<sup>th</sup> Street, 12<sup>th</sup> Floor  
New York, New York 10001  
Telephone: (212) 490-4700

***Defendants:***

1. KAY RIECK: docket does not reflect service or counsel
2. LARS DEGENHARDT: docket does not reflect service or counsel

3. THEODOR VAN STEPHOUDT: docket does not reflect service or counsel
4. DAVID HRYCK: docket does not reflect service or counsel
5. REED SMITH LLP: docket does not reflect service or counsel
6. THOMAS E. HORD: docket does not reflect service or counsel
7. MICHAEL ANTHONY NUNES: docket does not reflect service or counsel
8. STONE PIGMAN WALTHER WITTMANN L.L.C.:

***Attorneys of record:***

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9. DAVID ELDER: docket does not reflect service or counsel
10. BRUCE GANER: docket does not reflect service or counsel
11. SIERRA PINE RESOURCES INTERNATIONAL, INC.: docket does not reflect service or counsel
12. HELENA ENERGY, LLC: docket does not reflect service or counsel

**3. Jury Demand:**

Was a Jury Demand made in State Court? Yes. By Plaintiff on August 6, 2021.

**4. Answer:**

Was an Answer made in State Court? No.

**5. Unserved Parties:**

The following parties have not been served at the time this case was removed:

<b>Party</b>	<b>Reason(s) for No Service</b>
KAY RIECK	Docket shows citation issued, but no record of service
LARS DEGENHARDT	Docket shows citation issued, but no record of service
THEODOR VAN STEPHOUDT	Docket shows citation issued, but no record of service
DAVID HRYCK	Docket shows citation issued, but no record of service
REED SMITH LLP	Docket shows citation issued, but no record of service
THOMAS E. HORD	Docket shows citation issued, but no record of service
MICHAEL ANTHONY NUNES	Docket shows citation issued, but no record of service
DAVID ELDER	Docket shows citation issued, but no record of service
BRUCE GANER	Docket shows citation issued, but no record of service
SIERRA PINE RESOURCES INTERNATIONAL, INC.:	Docket shows citation issued, but no record of service
HELENA ENERGY, LLC	Docket shows citation issued, but no record of service

**6. Nonsuited, Dismissed, or Terminated Parties:**

Please indicate any changes from the style on the State Court papers and the reason for that change:

None.

**7. Claims of the Parties:**

The filing party submits the following summary of the remaining claims of each party in this litigation:

Plaintiff CLINGMAN & HANGER MANAGEMENT ASSOCIATES, LLC, AS TRUSTEE OF THE FURIE LITIGATION TRUST, asserts the following purported causes of action against various defendants:

First Cause of Action: "Breach of Fiduciary Duty"

Second Cause of Action: "Aiding and Abetting Breach of Fiduciary Duty"

Third Cause of Action: “Actual Fraudulent Transfer under 11 U.S.C. § 548(a)(1) and TEX. BUS. & COMM. CODE § 24.005(a)(1)”

Fourth Cause of Action: “Constructive Fraudulent Transfer under 11 U.S.C. § 548(a)(1)(B)(I)-(III) and TEX. BUS. & COMM. CODE § 24.005(a)(2)(A)-(B) and § 24.006”

Fifth Cause of Action: “Insider Fraudulent Transfer under TEX. BUS. & COMM. CODE § 24.006(b)”

Sixth Cause of Action: “Unjust Enrichment”

Seventh Cause of Action: “Civil Conspiracy”

Eighth Cause of Action: “Exemplary Damages”

Ninth Cause of Action: “Attorneys’ Fees”